

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JANE DOES 1–4,

Plaintiffs,

v.

WESTMONT HOSPITALITY GROUP,  
INC.,

Defendants.

Civil Action No.  
1:21-cv-04278-WMR

**JOINT MOTION TO DISMISS CLAIMS AGAINST  
WESTMONT HOSPITALITY GROUP, INC.**

Plaintiffs Jane Does 1–4 and Defendant Westmont Hospitality Group, Inc. (“Westmont”) have reached an agreement to resolve all of Plaintiffs’ claims against Westmont with prejudice. Accordingly, Plaintiffs and Westmont request that the Court enter the attached Order dismissing those claims with prejudice.

Respectfully submitted this 17th day of August 2023.

/s/Michael R. Baumrind

John E. Floyd

Georgia Bar No. 266413

floyd@bmelaw.com

Manoj S. Varghese

Georgia Bar No. 734668

varghese@bmelaw.com

Tiana S. Mykkeltvedt

Georgia Bar No. 533512

mykkeltvedt@bmelaw.com

Amanda Kay Seals

Georgia Bar No. 502720  
seals@bmelaw.com  
Michael R. Baumrind  
Georgia Bar No. 960296  
baumrind@bmelaw.com  
Juliana Mesa  
Georgia Bar No. 585087  
mesa@bmelaw.com

BONDURANT, MIXSON & ELMORE, LLP  
1201 West Peachtree Street, N.W., Suite 3900  
Atlanta, Georgia 30309  
(404) 881-4100 – Telephone  
(404) 881-4111 – Facsimile

Jonathan S. Tonge  
jtonge@atclawfirm.com  
Georgia Bar No. 303999  
Patrick J. McDonough  
Georgia Bar No. 489855  
pmcdonough@atclawfirm.com

ANDERSEN, TATE & CARR, P.C.  
One Sugarloaf Centre  
1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia 30097  
(770) 822-0900 – Telephone  
(770) 822-9680 – Facsimile

***Counsel for Plaintiffs***

/s/ Chelsea R. Mikula

C. Ashley Saferight

Admitted *Pro Hac Vice*

Ashley.saferight@tuckerellis.com

Chelsea R. Mikula

Admitted *Pro Hac Vice*

Chelsea.mikula@tuckerellis.com

Sandra Wunderlich

Admitted *Pro Hac Vice*

Sandra.wunderlich@tuckerellis.com

TUCKER ELLIS, LLP-C. OH  
950 Main Avenue, Suite 1100  
Cleveland, OH 44113-7213  
(216) 696-3864 – Telephone  
(216) 592-5009 – Facsimile

***Counsel for Defendant Westmont Hospitality Group, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the within and foregoing **JOINT MOTION TO DISMISS CLAIMS AGAINST WESTMONT HOSPITALITY GROUP, INC.** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

This 17th day of August 2023.

/s/ Michael R. Baumrind  
Michael R. Baumrind  
Georgia Bar No. 960296